

**FILED**

APR 09 2008

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MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FRANK P. QUALTIER

**08CR**

**289**

No. \_\_\_\_\_  
Violation: Title 26,  
United States Code,  
Sections 7206(1), 7203

08 CR 289

**JUDGE GETTLEMAN**

COUNT ONE

**MAGISTRATE JUDGE COX**

THE UNITED STATES ATTORNEY charges:

1. At times material to this information, FRANK P. QUALTIER earned and received income from a home remodeling business called Innovative Renovations, Inc. that he owned and operated in Naperville, Illinois.

2. On or about June 5, 2003, in the Northern District of Illinois, Eastern Division,

FRANK P. QUALTIER,

defendant herein, then a resident of Naperville, Illinois, willfully made and subscribed and caused to be made and subscribed a United States Individual Income Tax Return (Form 1040) for the calendar year 2001, which was verified by a written declaration that it was made under the penalties of perjury and which he filed and caused to be filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that it was falsely stated on said return that:

a) the defendant was unemployed; and

b) that the total income received by the defendant and his spouse for 2001 was \$19,598.78;

whereas in truth and fact, as the defendant well knew, during the year 2001,

a) he had been employed and receiving gross income from Innovative Restorations, Inc.,

b) the total income received by the defendant and his spouse was approximately \$119,885.00;

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO

THE UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One of this Information is hereby incorporated herein by reference.
2. During the calendar year 2002, in the Northern District of Illinois, Eastern Division,

FRANK P. QUALTIER,

defendant herein, was a resident of Naperville, Illinois, and earned and received gross income of approximately \$284,882.00.

3. By reason of such income, defendant FRANK P. QUALTIER was required by law, following the close of the calendar year 2002 and or before April 15, 2003, to make an income tax return to the District Director of Internal Revenue for the Internal Revenue District of Chicago, at Chicago, in the Northern District of Illinois, Eastern Division, or to the Director, Internal Revenue Service Center, Midwest Region, Kansas City, Missouri, stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. Well knowing all of the foregoing facts, defendant FRANK P. QUALTIER willfully did fail to make the required income tax return to that District Director of Internal Revenue, to that Director of the Internal Revenue Service Center, or to any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

COUNT THREE

THE UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One of this Information is hereby incorporated herein by reference.
2. During the calendar year 2003, in the Northern District of Illinois, Eastern Division,

FRANK P. QUALTIER,

defendant herein, was a resident of Naperville, Illinois, and earned and received gross income of approximately \$238,895.00.

3. By reason of such income, defendant FRANK P. QUALTIER was required by law, following the close of the calendar year 2003 and or before April 15, 2004, to make an income tax return to the District Director of Internal Revenue for the Internal Revenue District of Chicago, at Chicago, in the Northern District of Illinois, Eastern Division, or to the Director, Internal Revenue Service Center, Midwest Region, Kansas City, Missouri, stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. Well knowing all of the foregoing facts, defendant FRANK P. QUALTIER willfully did fail to make the required income tax return to that District Director of Internal Revenue, to that Director of the Internal Revenue Service Center, or to any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

COUNT FOUR

THE UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One of this Information is hereby incorporated herein by reference.
2. During the calendar year 2004, in the Northern District of Illinois, Eastern Division,

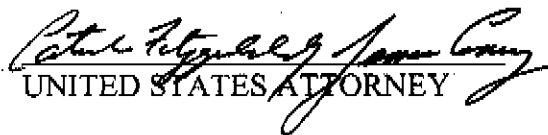
FRANK P. QUALTIER,

defendant herein, was a resident of Naperville, Illinois, and earned and received gross income of approximately \$162,431.00.

3. By reason of such income, defendant FRANK P. QUALTIER was required by law, following the close of the calendar year 2004 and or before April 15, 2005, to make an income tax return to the District Director of Internal Revenue for the Internal Revenue District of Chicago, at Chicago, in the Northern District of Illinois, Eastern Division, or to the Director, Internal Revenue Service Center, Midwest Region, Kansas City, Missouri, stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. Well knowing all of the foregoing facts, defendant FRANK P. QUALTIER willfully did fail to make the required income tax return to that District Director of Internal Revenue, to that Director of the Internal Revenue Service Center, or to any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

  
UNITED STATES ATTORNEY